

**Anglian Water response to OFWAT Paying Fair request, questions 3a to 3j, dated 25<sup>th</sup> April 2025**

**3a. How do you regularly quality assure your people, procedures and systems use customer information correctly? (Principle 1, Expectations: 'Ensure information about customers is correct, up to date and is used')**

We train and coach our agents against established procedures under our umbrella 'Make Today Great' brand which ensures they all feel empowered to do what they can to bring great customer experience to life, no matter what their role is. This training is built upon our core values – Building Trust, Doing the Right Thing and Always Exploring, while working as one team, smashing down silos and unblocking our path to success.

We perform sample quality checks and operate feedback/quality reject processes to improve data accuracy and reduce future errors. Our speech analytics tool has been developed to assess our customer calls against these Make Today Great behaviours. And it will also assess against vulnerability indicators, GDPR, first time resolution, compliance and overall customer satisfaction. This tool also provides detail on reasons for call and highlights areas for process improvements.

Speech analytics reports are generated in near real time allowing our coaches, managers and leaders to understand current performances and take remedial action where needed.

In addition to our speech analytics reporting and coaching we have a team of quality and compliance specialists who carry out manual checks and who then subsequently produce training material or process updates where necessary.

We also use bureaux data and have a range of data sharing agreements in place with various organisations such as local authorities, landlords, land registry, credit bureaux and the Department of Work and Pensions. We operate a Data Interrogation Team who utilise the data sharing arrangements / portals to maintain and improve the accuracy of the customer billing data in our systems. The Data Interrogation Team manage a range of processes, including Void Monitoring, Residency Checking and Tracing processes.

**3b. Can you outline how your company is using credit reference agency data and applying best practice in using it? And what is your approach to correcting any errors? (Principle 1, Expectations: 'Use best practice when using credit reference agencies')**

- We follow SCOR best practice by sharing full credit reference data with Experian, Equifax and TransUnion.
- We procure data from all 3 bureaux and multi bureaux in accordance with established arrangements.
- We comply with all relevant guidance, including:
  - Data Protection Act 2018 (GDPR)
  - SCOR Data Quality Reference Guide
  - Credit Reference Agency Information Notice (CRAIN)
  - Principles of Reciprocity

- We reference data sharing in the condensed version of our Privacy Notice, inserted with annual bills and in our full version of our Privacy Notice, published on our website.
- Individual test SQL queries are run against the monthly file simulations and data cleansed before submitting monthly files using automated routines. Files are sent to bureaux via secure data transfer.
- Monthly Credit Reference Agency Quality, Validation & Warning Reports actioned and corrected (where necessary) on receipt of reports from Credit Bureaux.
- Direct access to the Credit Reference Agency portals whereby our trained agents can correct credit records via each secure Credit Reference Agency Amendment portal. This involves the trained agent logging into each CRA amendment portal with their own authorised user credentials to make the amendment.
- Customer Queries raised by the bureaux via their portals are acted upon and where possible corrections are made within the bureaux portals. If a correction can't be made within a portal, an amendment request is sent directly to the CRA via their own secure transfer system.
- We use credit reference data to target support and enhance the quality and integrity of our data as follows:
  - Affordability scorecards to target assistance to customers who are likely to be struggling to pay. Example, Experian's AAM scorecard is used in our telephony platform to route customers with a low score into our Extra Care Teams.
  - Enhance data by establishing full name (title, forename, surname), telephone number, dates of birth, premise address and move in/out dates for customers.
  - Establish occupiers of void properties.
  - Establish forwarding addresses for absconded customers.
  - Perform residency checks for disengaged customers.
- We operate a Data Interrogation Team who analyse bureaux batch files and systems to validate information and update our systems.

**3c. Can you describe in more detail how your company gives sufficient reminders (appropriately spaced) to pay? (Principle 4, Expectations: 'Send clear reminders that provide advice and next steps')**

- We send digital comms to remind customers when a payment becomes due and when a payment is overdue, our customers are profiled and segmented into risk categories before being routed through a series of debt recovery strategies that include actions, such as:
  - email
  - SMS/WhatsApp
  - Interactive Voice Messaging
  - Telephone
  - Letters/Notices
  - Doorstep Visits
  - ReachOut referrals (Sigma Connected) – this won Best Vulnerable Customer Support Initiative at Utilities and Telecoms Awards 2022
  - County Court litigation and enforcement
  - Debt Collection Agency referrals

.....the time between actions is typically around a fortnight and the method used will depend on the customers individual circumstances.

All correspondence urges customers struggling to pay to make contact and explains the consequences of non-payment. We advise customers how and where to pay, promote metering and advise of alternative tariffs, the option to pay by instalments, and signpost where to get free independent advice.

- We bill customers in SAP-ISU and utilise Experian's Tallyman system to manage this process.
- All SAP-ISU customers are replicated in Tallyman and data is refreshed daily with relevant updates from the billing system, including updates to customer accounts, contact details, bills, and payments.
- We operate automated daily batch routines that monitor accounts and trigger collections activities when accounts fall overdue. These same routines ensure our collections activities are suspended when debts are cleared, accounts are on hold and when further time is needed for customers to respond. They also manage the time between actions in accordance with pre-configured rules (typically we wait around 2 weeks between each step of our collections process).
- We utilise bespoke scorecards to segment customers into risk categories and then route them through a series of strategies and early collection activities that attempt to engage these customers.
- Customers who fail to engage through the process are routed through a bespoke litigation scorecard that routes them to either litigation or debt collection agencies.
- Customers routed to litigation will be progressed automatically to enforcement after obtaining a County Court judgment. Enforcement activities include Charging Orders, Attachment of Earnings, referrals to high court and bailiffs.

- Customers routed to Debt Collection Agencies will go through 3 placements and will be reassessed for litigation between each placement.
- Our established strategies are regularly reviewed and updated to improve customer engagement, collection rates and reduce bad debt.

**3d. Can you describe how your company uses different methods of contact to engage customers? (Principle 4, Expectations: ‘Contact customers using different methods and stop chasing them if they are getting debt advice’)**

- We utilise a range of methods to prompt our customers to engage, including:
  - Pre-delinquent alerts
  - email
  - SMS/WhatsApp
  - Interactive Voice Messaging
  - Telephone
  - Letters/Notices
  - Doorstep Visits
  - ReachOut referrals (Sigma Connected) – this won Best Vulnerable Customer Support Initiative at Utilities and Telecoms Awards 2022
  - County Court litigation and enforcement
  - Debt Collection Agency referrals
- We suspend collection activities when we become aware a customer is receiving debt advice.

**3e. Can you describe how you are designing communications around the customers’ information needs? (Principle 5, Expectations: Design the content of communications around customers’ information needs’ AND ‘Tailor the language of communications to customer’s needs’)**

We work with our customers via our online community and other partnerships that represent our customers to ensure our communications are tailored to our customers’ needs. Dialling up the support available to provide reassurance.

Wider Marketing communications include stories from our Customer Services team who support our customers to show we are authentic, caring, and available to support. Providing a broader reassurance that we are a company who listens and supports.

Teams in Customer Service follow internal processes to brief the Brand & Marketing team on any requirements to create or amend customer communications around billing, debt, or financial support

Our brand and marketing team work closely alongside our customer facing teams and meet regularly to discuss areas of opportunity and for change. Together we operate a quarterly planning model, prioritising areas of work accordingly. Within Anglian we currently operate an Affordability and Vulnerability Steering group, meeting regularly to drive improvements and performance and Brand and marketing are a key member of this group

We have a dedicated brand team to review communications to ensure accessibility, simplicity, empathy in addition to reviewing and refining our collective learning using feedback from customers.

We have a dedicated design team to adopt customer feedback and learnings into communications to ensure we are always listening and evolving our work.

**3f. Does your company use enforcement action as a last resort? In particular, how do you make sure any enforcement action you take, or charges added are proportionate and reasonable in relation to the circumstances of the customer and the size of the debt. (Principle 5, Expectations: 'Use enforcement action as a last resort')**

- Enforcement action is performed as a latest resort after exhausting all available internal collection activities
- We utilise scorecards and consider the size of debt when routing customers through a range of differentiated collection treatment paths.
- All individual collection methods have a minimum threshold which are set to ensure any charges raised are proportionate and reasonable in relation to the circumstances of the customer and the size of the debt. Accounts are only subjected to these actions if the customer meets the segmentation rules, the debt is above the minimum thresholds, there are no active payment plans, sufficient time has elapsed since the last action and provided the account has not been suspended.
- Enforcement activities will be suspended when we identify customers in vulnerable circumstances.

**3g. Can you describe how you are agreeing realistic repayment plans? (Principle 6, Expectations 'Agree repayment levels that are realistic, understandable and regularly reviewed')**

- Customers will be guided through our Extra Care Assessment tool which is a bespoke version of Policy in Practices benefits calculator. This tool is available as a self-service tool and via our Extra Care Contact Teams. Customers can also port data from the Gov.UK benefits calculator. This industry leading work is up for numerous vulnerable customer support awards in 2023. We are the only company to have delivered this capability. This was showcased and shared in 2022 at an all company CCW vulnerability best practice event.
- Once we've established the household composition, relevant income and expenditure, we will refer customers needing holistic support to StepChange and will signpost the customers to state benefits and warm home discounts if it appears they may be eligible. We will also assess customers against our full range of concessionary tariffs and will register them for the most favourable tariff.
- Eligible customers will be supported by our Hardship Fund (Anglian Water Assistance Fund) or our payment matching scheme (Back on Track).

- We will agree a payment plan that aims to clear ongoing charges, plus an affordable contribution towards the arrears.
- When customers need temporary forbearance, we will apply a payment break for an agreed timeframe that enables them to make their payment.

**3h. Does your company have robust audit processes in place for debt collection agents? (Principle 7, Expectations: 'Use reputable debt collection companies that treat customers fairly and in line with agreed levels of service' AND 'Regularly and robustly check customers facing debt recovery action are treated sensitively' AND 'Allow customers to raise disputes involving the agent with the water company')**

- Our panel of Debt Collection Agencies was appointed following a thorough tender exercise.
- Contract Agreements for Debt Collection Services, include a 'Supplier and Framework Management' schedule which set out our expectations, including provisions for audits.
- Debt Collection Agencies are incentivised to identify customers who may benefit from concessionary tariffs.
- Each contract is supported by a Service Manual which documents in detail our processes, files specifications, withdrawal processes, complaints processes and details of our Watercare package. We also agree the contents of their letters and proposed strategies.
- Full audits are typically performed annually. In advance of each audit, we issue the supplier a pre-audit questionnaire for them to complete detailed information about the following:

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- On receipt of the questionnaire, we discuss the relevant sections of the pre-audit questionnaire, hot topics, and we audit a random selection of customer accounts.
- We listen to random calls monthly for each Debt Collection Agency and provide feedback / corrective actions where necessary.
- We also perform interim audits throughout the year, such as call recordings, compliance against services, procedures and agreed strategies, remittance/invoicing, security, health and safety, and regulation compliance (PCI Compliance, CSA Membership, FCA licence etc.)
- Following each audit, we issue an issues log and action plan which is actively monitored until all actions are complete.
- Customer complaints are investigated thoroughly by us within strict levels of service. Where necessary we will agree corrective actions with Debt Collection Agencies to ensure the issue does not arise again.

### **3i. Can you describe in more detail how your company ensures priority services customers get the support they need? (Principle 7, Expectation: Ensure the needs of priority service register customers are met)**

A fundamental part of our vulnerability strategy is to work in partnerships with organisations to enhance and extend the support we can provide to customers. Our partnerships are key to helping us reach customer groups that are traditionally more challenging to engage with, such as those who are in a vulnerable situation.

We are proud of the breadth and depth of our customer partnerships. Since 2019, we have engaged with over 600 organisations (including local and national charities, community groups, local authorities, and other utility companies) and currently have over 150 active partnerships across the region. These organisations have a combined reach of 1.12 million customers.

We routinely analyse our complaints and have dedicated working groups that meet monthly to understand opportunities to enhance our service, improve communications and mitigate future occurrences.

Anglian Water adopts inclusive service design as part of our design process and both our website and online account management platform MyAccount have intelligent software that enables us to track how our customers use and interact with our services to understand pain points and potential opportunities for improvement.

Our Partnership team, with the help of some of our partner organisations have recruited a dedicated Customer Champion Group, representative of all customers across our region. The aim of this is to enable us to test as much as we can with a range of customers, to ensure new processes, materials and collateral produced are inclusive and accessible to all. The group of 19 customers (and growing) represents a range of customer groups, including customers who are hard of hearing, carers, older customers, and those living with a disability.

Since the recruitment of the Customer Champions, we have worked with them when we have created new support collateral e.g. Our posters and flyers promoting our support schemes. Their feedback has ensured they're accessible, having the font being a minimum size 16 and ensuring digital versions have images coded, to ensure the documents are screen reader friendly. In addition to this, we have engaged with our Customer Champions Group on our Priority Services registration process on our website.

Most recently, we invited our Customer Champions to attend the Your Water, Your Say event - to ensure the views of customers in vulnerable circumstances were being represented.

In 2020, we worked with Scope to help us engage with over 1,000 disabled customers to help us better understand the needs of our customers living with a disability. The research identified which customer groups had the lowest awareness of our support schemes, which included customers who had communication needs. This allowed us to create a partnership strategy which aimed to plug these gaps, striking up partnerships with organisations including Lincolnshire Sensory Services, Hartlepool Vision Support and more.

In order to check we are delivering the support that is needed we regularly measure customer satisfaction of those in vulnerable situations and/or on our PSR. To demonstrate the quality of the service provided to our vulnerable customers we are extremely proud to be amongst the first in the world to be assessed and to achieve the international standard ISO22458 which measures how we design and deliver fair, flexible, and inclusive services for consumers in vulnerable situations.

**3j. We understand that CCW has given feedback on your debt code of practice. How have you acted on CCW's feedback?**

Within the last year we have shared our core customer information (including the debt code of practice) with CCW to gain their input, advice and feedback. The feedback they provided was fully



adopted and the document updated accordingly. This included updating our document and our website to ensure we adopted the common descriptors